



Mike Saperstein

Vice President, Federal Regulatory Affairs
1800 M Street, NW, Suite 800N
Washington, DC 20036
(203) 614-4708
michael.saperstein@ftr.com

October 21, 2016

VIA ECFS

Marlene H. Dortch, Secretary
Federal Communications Commission
445 Twelfth Street, S.W.
Washington, DC 20554

Re: *Business Data Services in an Internet Protocol Environment et al., WC
Docket Nos. 16-143, 15-247, and 05-25 and RM-10593*

Dear Ms. Dortch:

On October 19, 2016, Kathleen Abernathy, Executive Vice President, External Affairs for Frontier Communications and I met separately with Stephanie Weiner, Senior Legal Advisor, Wireline, to Chairman Wheeler; Claude Aiken, Wireline Legal Advisor to Commissioner Clyburn; Travis Litman, Senior Legal Advisor to Commissioner Rosenworcel; Nick Degani, Legal Advisor, Wireline, to Commissioner Pai; and Amy Bender, Legal Advisor, Wireline, to Commissioner O'Rielly; to discuss the proceeding referenced above.

Frontier used the attached presentation to discuss the ways in which the draft BDS proposal would unduly affect mid-size ILECs like Frontier in ways that would be deeply harmful to investment in American broadband connectivity and jobs. Frontier also stated the importance of ensuring that the Commission carefully consider the current state of market competition in how it implements any reform to existing grants of Phase II pricing flexibility, noting the particularly competitive nature of the transport market.

Please contact me with any questions.

Sincerely,

Mike Saperstein

cc: Stephanie Weiner
Claude Aiken
Travis Litman
Nick Degani
Amy Bender